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Joanne Marchetta, Marsha Berkbigler and Sue  
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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MONICA EISENTECKEN, TAHOE  
STEWARDS, LLC, TAHOE FOR SAFER  
TECH, and ENVIRONMENTAL HEALTH  
TRUST,

Plaintiffs,

v.

TAHOE REGIONAL PLANNING  
AGENCY; JOANNE MARCHETTA, in her  
official and individual capacities, MARSHA  
BERKBIGLER in her official and individual  
capacities; SUE NOVASEL, in her official  
and representative capacities; GUILLIAM  
NEL; TAHOE PROSPERITY CENTER,  
INC.; SACRAMENTO-VALLEY LIMITED  
PARTNERSHIP dba VERIZON WIRELESS,  
and DOES 1-100,

Defendants.

2:20-cv-02349-TLN-CKD

**STIPULATION AND ORDER TO  
EXTEND TIME FOR  
DEFENDANTS TO FILE  
REPLIES IN SUPPORT OF  
THEIR MOTIONS TO DISMISS**

Pursuant to Local Rule 144, Plaintiffs Monica Eisenstecken, Tahoe Stewards, LLC, Tahoe for Safer Tech and Environmental Health Trust, and Defendants Tahoe Regional Planning Agency, Joanne Marchetta, Marsha Berkgigler and Sue Novasel (collectively, the “TRPA Defendants”) and Defendants Guillian Nel and Sacramento-Valley Limited Partnership dba Verizon Wireless (collectively, the “Verizon Defendants”), through their respective undersigned counsel, stipulate and agree as follows:

On March 3, 2021, the TRPA Defendants filed their Notice of Motion, Motion to Dismiss and Brief in Support of Motion to Dismiss (ECF Nos. 12 and 13), and the Verizon Defendants filed their Notice of Motion and Motion to Dismiss (ECF Nos. 16 and 17). On June 10, 2021, Plaintiffs filed their opposition to the TRPA Defendants’ Motion to Dismiss (ECF No. 34) and their opposition to the Verizon Defendants’ Motion to Dismiss (ECF No. 33). The Court vacated the hearing related to the pending Motions to Dismiss in this case (ECF No. 32). The TRPA Defendants’ Reply in Support of their Motion to Dismiss and the Verizon Defendants’ Reply in Support of their Motion to Dismiss are currently due on June 17, 2021.

The parties stipulate and agree that the due date for TRPA Defendants to file a Reply in Support of their Motion to Dismiss and the Verizon Defendants to file a Reply in Support of their Motion to Dismiss is extended two weeks, to and including July 1, 2021.

This is the first stipulation for extension of time related to the TRPA Defendants’ and Verizon Defendants’ Replies in Support of their Motions to Dismiss. This extension of time is necessary due to Defendants’ counsel facing a number of conflicting deadlines and obligations, as well as the extensive arguments made in ECF Nos. 33 and 34.

Pursuant to Local Rule 144, TRPA Defendants sought this extension from Plaintiffs and the Court by way of this Stipulation and Order as soon as the need became apparent and prior to the filing due date. The parties represent that this stipulation is made in good faith and not for the purpose of delay.

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DATED: June 16, 2021

LEONARD LAW, PC

/s/ Debbie Leonard

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*Attorneys for TRPA Defendants*

DATED: June 16, 2021

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/s/ James A. Heard

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*Attorneys for Verizon Defendants*

**IT IS SO ORDERED.**

DATED: June 16, 2021

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/s/ Robert J. Berg

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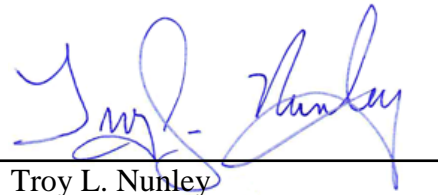
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Troy L. Nunley  
United States District Judge